Message

From: Minter, Douglas [Minter.Douglas@epa.gov]

Sent: 1/24/2020 10:27:04 PM

To: Bahrman, Sarah [Bahrman.Sarah@epa.gov]; Robinson, Valois [Robinson.Valois@epa.gov]

Subject: RE: my updated list

Thank you Sarah: this will certainly help in me assuming a larger project management role with the team!

I will go ahead with the invite.

Have a great weekend,

Douglas

From: Bahrman, Sarah < Bahrman. Sarah@epa.gov>

Sent: Friday, January 24, 2020 3:25 PM

To: Robinson, Valois < Robinson. Valois@epa.gov>; Minter, Douglas < Minter. Douglas@epa.gov>

Subject: RE: my updated list

Thanks – I don't have additional comments on this info for Monday.

FYI – I will use Valois's document to develop a schedule for each major task similar to what we had last time. I'll try to make that simpler, but I think it's a useful tool to track interim deadlines, particularly as we expand the team a bit. I'm not sure if I'll have that done by Monday, but I don't think it's needed for that discussion as much as our subsequent ones with the team.

Sarah E. Bahrman | Chief, Safe Drinking Water Branch | U.S. Environmental Protection Agency - Region 8 (p) 303.312.6243 | (c) 303.903.8515 | (f) 877.876.9101

From: Robinson, Valois Robinson.Valois@epa.gov

Sent: Friday, January 24, 2020 3:06 PM

To: Bahrman, Sarah < Bahrman. Sarah@epa.gov >; Minter, Douglas < Minter. Douglas@epa.gov >

Subject: RE: my updated list

I put FR at the top of the March/April list.

Valois

Valois Robinson U.S. EPA Region 8 MailCode: 8WD-SDU

1595 Wynkoop Street Denver, CO 80202-1129 Phone: (303) 312-6276

Fax: (303) 312-6741

Email: robinson.valois@epa.gov

From: Bahrman, Sarah < Bahrman, Sarah@epa.gov>

Sent: Friday, January 24, 2020 2:47 PM

To: Minter, Douglas < Minter. Douglas@epa.gov>; Robinson, Valois < Robinson. Valois@epa.gov>

Subject: RE: my updated list

Thanks – on the attachment from Valois, I suggest we move FR up a couple of months so we aren't leaving that until June. I actually suggest this be a talking point for the next PT call so they can get something submitted by the end of March.

I didn't get an updated attachment with this last email, but that was the only comment I had on the old version.

Sarah E. Bahrman | Chief, Safe Drinking Water Branch | U.S. Environmental Protection Agency - Region 8 (p) 303.312.6243 | (c) 303.903.8515 | (f) 877.876.9101

From: Minter, Douglas < Minter. Douglas@epa.gov >

Sent: Friday, January 24, 2020 2:44 PM

To: Robinson, Valois < Robinson, Valois@epa.gov>; Bahrman, Sarah < Bahrman, Sarah < a href="mailto:Bahrman.Sarah@epa.gov">Bahrman, Sarah@epa.gov>

Subject: RE: my updated list

Thanks.

Sarah: here is our most recent version for your review.

From: Robinson, Valois Robinson.Valois@epa.gov

Sent: Friday, January 24, 2020 2:28 PM

To: Minter, Douglas < Minter. Douglas@epa.gov>

Subject: RE: my updated list

Hi Douglas,

Your lists below look good to me. In the attached document, I added another bullet under January for the Cadmus contract amendment and changed the red text to black. I didn't see the date that you mentioned, so I added January 27, 2020 into the footer. I figure I can change text color for each item as it is completed and change footer date accordingly.

Valois

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From: Minter, Douglas < Minter. Douglas@epa.gov>

Sent: Friday, January 24, 2020 1:18 PM

To: Robinson, Valois Robinson, Valois@epa.gov; Bahrman, Sarah Bahrman, Sarah@epa.gov

Subject: FW: my updated list

Thanks Valois: my only edit was to insert a date for the document at the top.

Sarah: let us know if you have comments, etc. on this document and I will attach it to the invite for Monday.

Sarah/Valois: below is a revised set of the two lists that I will insert into the invite. Let me know if you any edits, etc.

Darcy: immediately below is an outline of the nature/scope of outstanding work for Dewey Burdock Final UIC Permit Issuance. The attached document proposes a detailed timeline (by month) which we believe is aggressive but still realistic.

Scope of Remaining Major Tasks:

- Review significant public comments to identify further changes to permits and ensure Cadmus Response to Comments document is adequate (VR/RA Lead).
- Modify draft permits, and aquifer exemption ROD and supporting documents based on comments received (VR: Class III/AE Lead & RA: Class V Lead).
- Update Cumulative Effects Analysis (CEA) in response to comments (Lead?)
- Update Environment Justice Document in response to comments (Lead?)
- Update Biological Assessment for ESA Compliance (OS-L Lead)
- Review/Revise Response to Comments document prepared by Cadmus with Azarga's assistance if needed (VR/DM/OSL/RA/LC Co-Leads)
- Finalize our plan for compliance with NHPA and document effort (VR/MB Co-Leads)
- Finalize our tribal consultation process, including the response documents for each tribe describing how we took their concerns and comments into consideration (OS-L Lead).
- Compile/Organize/Index the administrative record (Paralegal and/or Student Volunteer Lead).
- Ex. 5 Deliberative Process (DP)

(DM Lead).

- Financial Assurance review of Powertech's surety bond or other financial instruments (BD Lead)
- HQs/Region 8 senior management/RA briefings (DM Lead)
- RA Approval of Waiver for use of PVC well casing for the Class III wells (BS Lead)

This second set of bullets is offered to facilitate further brainstorming on how we may bring more resources to this effort.

Options for Procuring Additional Resources for Final UIC Permit Issuance:

- Student Volunteer (Document Management and/or Administrative Record)
- Paralegal (Administrative Record)
- Increased FTE investment within UIC Section (Omar, Douglas, Bruce, and vice-Sierra Lopez hire?)
- Postpone other UIC Section commitments (e.g., permit renewals and legacy permits)
- Delegate other UIC work to non-DB Team Members within Section (e.g., WOGCC AE backlog)
- Solicit collateral duty from in/outside Water Division
- Increase HQ funding of Cadmus contract hours for RTC, tribal consultation, and Class III technical support
- Recruit support on EJ and CEA from outside UIC Section
- Other ideas ??

Douglas

From: Robinson, Valois < Robinson. Valois@epa.gov>

Sent: Friday, January 24, 2020 12:29 PM

To: Minter, Douglas < Minter. Douglas@epa.gov>

Subject: RE: my updated list

Here is my updated list. Thanks for looking it over.

Valois

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From: Minter, Douglas < Minter. Douglas@epa.gov>

Sent: Friday, January 24, 2020 11:42 AM

To: Robinson, Valois Robinson, Valois@epa.gov

Subject: RE: Additions to your bullet list

Thanks: I will send an updated list with names, etc. to you and Sarah next.

Happy to review an updated version of your timeline document. I'm glad Sarah agreed to share this with Darcy.

From: Robinson, Valois < Robinson. Valois@epa.gov>

Sent: Friday, January 24, 2020 11:33 AM

To: Minter, Douglas < Minter. Douglas@epa.gov>

Subject: Additions to your bullet list

- Review significant/relevant public comments from the second public comment period to ensure Cadmus' Response to Comments document is adequate.
- Modify the draft permits, aquifer exemption, and supporting documents (CEA, EJ, maybe ESA) as needed based on comments received.
- Review/Revise Response to Comments document prepared by Cadmus. (note: we made need to ask Azarga for assistance to obtain information to needed for some of the responses.)
- Finalize our plan for compliance with NHPA and document that effort
- Finalize our tribal consultation process, including the response documents for each tribe describing how we took their concerns and comments into consideration.
- Finalize the administrative record and index.

Ex. 5 Deliberative Process (DP)

- Financial Assurance review once Powertech submits the FR package
- Coordination with HQ offices related to NRC concerns
- HQ and Region 8 manager briefings
- RA approval of waiver for use of PVC well casing for the Class III wells
- RA Briefings

Valois

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